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ORACLE AMERICA, INC.

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 ORACLE AMERICA, INC.
24 v.
Plaintiff,
25 GOOGLE INC.
Defendant.

Case No. CV 10-03561 WHA
**DECLARATION OF CHRISTINA VON
DER AHE RAYBURN IN SUPPORT OF
ORACLE'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**
Dept.: Courtroom 8, 19th Floor
Judge: Honorable William H. Alsup

1 I, Christina Von der Ahe Rayburn, declare and state as follows:

2 1. I am a member of the bar of the State of California, admitted to practice before this
3 Court, and a senior associate with the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”),
4 attorneys of record for plaintiff Oracle America, Inc. (“Oracle”). I am familiar with the events,
5 pleadings and discovery in this action and, if called upon as a witness, I could and would testify
6 competently to the matters stated herein of my own personal knowledge.

7 2. I submit this declaration in support of Oracle’s Administrative Motion to File
8 Under Seal.

9 3. The following documents summarize, quote from, or reproduce materials that have
10 been marked “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES
11 ONLY” in the form that they were produced.

- 12 • Portions of Oracle’s Statement Regarding Dr. Kearl’s Lack of Compliance with
13 the Court’s Order;
- 14 • The entirety of Exhibits 2-5 to the Declaration of Annette L. Hurst in Support of
15 Oracle’s Statement Regarding Dr. Kearl’s Lack of Compliance with the Court’s
16 Order (“Hurst Declaration”); and
- 17 • Portions of Exhibit 6 to the Hurst Declaration.

18 4. Pursuant to Civil Local Rule 79-5(e), Oracle is required to identify and serve this
19 declaration upon any party or non-party designating the material. No party or non-party has
20 appeared to Oracle to assert these designations. Dr. Kearl has affirmatively disavowed any
21 interest in the confidentiality of the material. However, Dr. Kearl is also the only non-party in
22 this matter who is subject to the Court’s order. Accordingly, Oracle is serving these materials on
23 Dr. Kearl’s counsel with the expectation that he will disseminate them to anyone who claims an
24 interest herein and is thus responsible for designating the information.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed this 10th day of September, 2015, at Laguna Beach, CA.
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5 */s/ Christina Von der Ahe Rayburn*
6 Christina Von der Ahe Rayburn

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